

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	NO. 08 CR 846
v.)	
)	
JON BURGE,)	
)	
Defendant.)	

MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE

Now comes the Defendant, **JON BURGE**, by and through his attorney, **RICHARD M. BEUKE**, and respectfully requests this Court enter an order modifying the conditions of his supervised release:

In support of this request, the following is submitted:

1. Defendant Jon Burge was charged and found guilty in the above case of perjury. For his conduct Defendant was sentenced to 54 months imprisonment.
2. Defendant served his jail sentence and has started his 36 months term of supervised release.
3. Defendant has recently had some serious medical issues which counsel would prefer to apprise the Court of in person.
4. Defendant has a strict regimen of medical testing and treatment that he will have to complete over the period of the next several months.
5. The condition imposed on his supervised release of drug testing and alcohol counseling are seemingly unnecessary and difficult to fit into the schedule of

medical treatments he must undergo in the foreseeable future.

6. According to his probation officer, Reese Dorsey, he has been compliant with all conditions of his release. According to his probation officer Defendant has paid all financial obligations and there are no remaining issues to be addressed.
7. Mr. Dorsey, his probation officer has no objection to modifying the conditions of his supervised release.
8. Assistant United States Attorney April Perry has been contacted and she has no objection to these modifications of Mr. Burge's supervised release conditions.

WHEREFORE, it is requested that this Honorable Court enter an order modifying the conditions of the Defendant's supervised release.

Respectfully submitted,

/s/Richard M. Beuke

Richard M. Beuke

Attorney for Defendant- Jon Burge

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